

1 Robert A. Christopher, Bar No. 89035  
2 rchristopher@hopkinscarley.com  
3 Eugene Ashley, Bar No. 171885  
eashley@hopkinscarley.com  
4 Dori L. Yob, Bar No. 227364  
dyob@hopkinscarley.com  
HOPKINS & CARLEY  
A Law Corporation  
The Letitia Building  
70 S First Street  
San Jose, CA 95113-2406

7 *mailing address:*

P.O. Box 1469  
8 San Jose, CA 95109-1469  
Telephone: (408) 286-9800  
9 Facsimile: (408) 998-4790

10 Attorneys for Defendants  
02 OPTICAL MEDIA, INC. and DAVID CHOU

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA

16 KONINKLIJKE PHILIPS  
17 ELECTRONICS N.V. and U.S.  
PHILIPS CORPORATION,

18 Plaintiffs,

v.

19 02 OPTICAL MEDIA, INC. and  
DAVID CHOU,

20 Defendants.

CASE NO. C-07-0858-SI

STIPULATION AND [PROPOSED] ORDER  
TO CONTINUE INITIAL CASE  
MANAGEMENT CONFERENCE AND FOR  
AN EXTENSION TO COMPLETE INITIAL  
DISCLOSURES AND FILE A CASE  
MANAGEMENT STATEMENT AND RULE  
26(F) REPORT

22 Pursuant to Federal Rule of Civil Procedure ("FRCP") 26 and Northern District Civil  
23 Local Rules 6-1(b) and 16-2(e), plaintiffs Koninklijke Philips Electronics N.V. and U.S. Philips  
24 Corporation (collectively, "Philips") and defendants O2 Optical Media, Inc. and David Chou  
25 (collectively, "Defendants"), by and through their respective counsel of record, hereby stipulate  
and agree to continue the Initial Case Management Conference (currently scheduled for Friday,  
26 June 8, 2007 at 2:00 p.m.) to Friday, June 15, 2007 at 2:00 p.m., or such other date and time as  
27 the Court may order. The parties further stipulate and agree to extend the deadline for the parties  
28

536272.2

STIPULATION AND [PROPOSED] ORDER TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND FOR AN EXTENSION  
TO COMPLETE INITIAL DISCLOSURES AND FILE RULE 26 DISCLOSURES AND CASE MANAGEMENT STATEMENT C-07-0858-SI

1 to complete initial disclosures pursuant to Rule 26 (or state objections to making such  
2 disclosures), and to file and serve a Case Management Statement and a Rule 26(f) report from  
3 Friday, June 1, 2007, to Friday, June 8, 2007.

4 This stipulation is submitted on the following grounds:

5 1. Philips filed the above-captioned lawsuit against Defendants on October 6, 2006 in  
6 the United States District Court for the Central District of California (Case No. CV 06-6382 ER);

7 2. Defendants answered Philips' Complaint on November 20, 2006;

8 3. On February 5, 2007, pursuant to 28 U.S.C. § 1404(a), the Honorable George P.  
9 Schiavelli transferred the case to the United States District Court for the Northern District of  
10 California (Case No. C 07-0858 BZ), where it was subsequently assigned to the Honorable Susan  
11 Illston;

12 4. The Initial Case Management Conference in this matter is presently scheduled for  
13 June 8, 2007 at 2:00 p.m.

14 5. FRCP Rule 26 and Northern District Civil Local Rule 16-2(e) permit the parties to  
15 submit a stipulation and request that the Court vary the dates of the initial case management  
16 schedule and dates for initial disclosure and meet and confer pursuant to FRCP Rule 26.

17 7. Based on the foregoing, the parties to the above-captioned matter, by and through  
18 their respective undersigned counsel, hereby agree and stipulate as follows:

19 a. To continue the date for the Case Management Conference currently set for  
20 June 8, 2007 at 2:00 p.m., until June 15, 2007 at 2:00 p.m., or such other date and time as the  
21 Court may order;

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

b. To extend the last day to complete initial disclosures pursuant to Rule 26, (or state objections to making such disclosures), and to file and serve a Case Management Statement and a Rule 26(f) report from Friday, June 1, 2007 to Friday, June 8, 2007.

## IT IS SO STIPULATED.

Dated: May 30, 2007

MAYER, BROWN, ROWE & MAW LLP

By: Rena Chng

Dated: May 30 2007

HOPKINS & CARLEY

Attorneys for Plaintiffs KONINKLIJKE PHILIPS  
ELECTRONICS N.V. and UNITED STATES  
PHILIPS CORPORATION

By: Dai Mob

~~Robert A. Christopher Dori L. Yab~~

Attorneys for Defendants

O2 OPTICAL MEDIA, INC. and DAVID CHOI

**PURSUANT TO STIPULATION IT IS SO ORDERED.**

Dated:

*Susan Illston*  
U.S. DISTRICT COURT JUDGE